## CAMILLE M. ABATE, ESQ. ATTORNEY AT LAW

Of Counsel, Nicholas Goodman & Associates 333 Park Avenue South, Suite 3A, New York, NY 10010 TEL: (212) 227-9003 • FAX: (212) 937-2112

January 18, 2022

## VIA ECF

The Honorable John Cronan United States District Judge Southern District of New York Daniel Patrick Moynihan Courthouse 500 Pearl Street, Courtroom 20C New York, New York 10007

> Re: *United States v. Natalya Shvarts* No. 20 Cr. 681 (S.D.N.Y.)

## Dear Judge Cronan:

I represent Natalya Shvarts in the above-captioned action. I respectfully seek to join in the motion of counsel for Marianna Levin and I request the same 30-day adjournment of the upcoming January 18, 2022 motions deadline in this matter, for many of the same reasons.

In addition, my ability to review the discovery with Ms. Shvarts in anticipation of motion practice was adversely impacted by my contracting Covid over the latter part of December and early part of January. I have not been in my office since December 18, and have had to postpone our in-person meeting until late next week.

Finally, the additional time is necessary because I have been discussing a possible resolution of the case with the government, which may obviate the need for motion practice.

I have spoken to AUSA Daniel Nessim on behalf of the government, and he consents to the extension of time for Ms. Shvarts.

Defendant Shvart's request is granted. The Court adjourns the January 18, 2022, motion deadline as to Ms. Shvarts only until February 17, 2022, to allow for additional time to meet and confer with the Government and to review the discovery with her counsel.

The Court will keep the conference for Ms. Shvarts, and the other defendants, currently scheduled for February 18, 2022, at 11:00 a.m. At that conference, the Court will discuss whether any filed motions require argument or an evidentiary hearing, and also ask for a status of this case from the Defendants and the Government.

Respectfully submitted,

Camille M. Abate, Esq.

Counsel for Natalya Shvarts

cc: AUSA Daniel Nessim, AUSA Nicholas Chiuchiolo (via ECF)

SO ORDERED. Date: January 19, 2022

New York, New York

JOHN P. CRONAN United States District Judge